

U.S. v. Edward S. Adams
Case No. 17-64 (DWF/KMM)

Exhibit 40

MEMORANDUM

To: RCL

From: ESA 

Date: November 27, 2008

Re: Warrants Sales

Per your request and as a further summary record of approval to date, the following is another total summary of warrant sales in 2006, 2007, and 2008. To confirm, the sellers were: Adams, Monahan & Sankovitz, LLP, Me, You, Bryant, Pat, and Larry Zipkin. I previously faxed the schedules of the sellers for approval and for the corporate records. Let me know if you need copies.

2006: RL Investments \$909,000

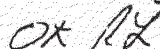
2007: Apollo Diamond Escrow \$800,000

2007: DL Investments \$1,771,500

2008: RL Investments \$1,498,000

All numbers are approximates.

Markets are rough, but DB is on it. We will get the big raise done.



ESA001251